

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA
Plaintiffs,

v.

COMMONWEALTH OF PUERTO RICO,
et. al.
Defendants.

Case No. 12-2039 (GAG)

**MOTION FOR LEAVE TO FILE SPANISH LANGUAGE DOCUMENT AND
EXTENSION TO FILE THE ENGLISH TRANSLATION**

COMES NOW the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (PRPB), through the undersigned counsel, who respectfully alleges and prays as follows:

1. On this same date, the undersigned has filed a *Response* to the Monitor's Assessment Report (Docket No. 1002) in virtue of paragraph 252 of the *Agreement for the Sustainable Reform of the Puerto Rico Police Bureau*.¹ Such *Response* in its original Spanish language version.
2. L.Cv.R.P. 5 (g) requires that all documents not in the English language, which are presented to or filed in this Court, must be accompanied at the time of presentation or filing by a certified translation into English. Moreover, the Jones Act requires that all pleadings and proceedings in the United States District Court for the District of Puerto Rico be conducted in the English language.

¹ Paragraph 252 states as follows:

The TCA shall provide a copy of the six-month reports to the Parties in draft form within 15 days after the end of the reporting period. The Parties shall have fifteen calendar days upon receipt of the draft report to allow the parties to informally comment on the draft reports. The TCA shall consider the Parties' responses and make appropriate changes, if any, and shall file the final report with the Court within 45 days of the end of the review period. DOJ and PRPD may file responses to the TCA's final report within 30 days (Emphasis added).

3. Nonetheless, the PRPB requests leave from this Court to permit at this time the filing of such *Response* in the Spanish language and a thirty (30) day extension of time, until January 6, 2019, to file the certified English translation of such *Response*.

4. In light of the foregoing, the PRPB respectfully requests from this Honorable Court that it be granted a brief extension of time of at least of thirty (30), to wit January 6, 2019, to file the certified English translation of the *Response* to which reference is made.

WHEREFORE, it is respectfully requested from this Honorable Court to take notice of the above stated and PRPB very respectfully requests that this Honorable Court grant an extension of thirty (30) days, until January 6, 2019, to file the certified English translation of the *Response* to which reference is made.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, December 7, 2018

WANDA VAZQUEZ GARCED
Secretary of Justice

WANDYMAR BURGOS VARGAS
Deputy in Charge of
General Litigation

SUSANA PEÑAGARICANO BROWN
Director Federal Litigation and
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